

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re

MEDICI 1150 N. AMERICAN STREET LLC,

Debtor.

Chapter 11

Case No.: 21-10074 JLG

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Section 1109(b) of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”) and Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), K&L Gates LLP hereby enters its appearance on behalf of Medici 1150 N. American Street LLC and requests that all notices given or required to be given and all papers served in this case be delivered to and served upon the parties identified below at the following address:

Travis Powers, Esq.
K&L GATES LLP
One Newark Center, Tenth Floor
1085 Raymond Boulevard
Newark, New Jersey 07102
Telephone: (973) 848-4000
Facsimile: (973) 848-4001
Email: travis.powers@klgates.com

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand not only includes notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all notices, orders, pleadings, motions, applications, complaints, demands, hearings, request, answers, replies, memoranda and briefs in support of any of the above, whether formal or informal, transmitted or conveyed by electronic delivery, mail delivery, telephone, facsimile or otherwise, in this case.

PLEASE TAKE FURTHER NOTICE that this notice of appearance, and any subsequent appearance, pleading, claim, or suit, is not intended, nor shall be deemed, to waive Medici 1150 N. American Street LLC's: (i) right to contest the subject matter or personal jurisdiction of this Court; (ii) right to seek abstention or withdrawal of any matter arising in this proceeding; (iii) right to have final orders in non-core matters entered only after de novo review by a United States District Court Judge; (iv) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (v) right to have the reference withdrawn by a United States District Court Judge in any matter subject to mandatory or discretionary withdrawal; (vi) right to enforce any contractual provisions with respect to arbitration; or (vii) other rights, claims, actions, defenses, setoffs or recoupments to which Medici 1150 N. American Street LLC is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

PLEASE TAKE FURTHER NOTICE that this appearance is a limited appearance for purposes of notice only. Accordingly, this Notice of Appearance is not to be construed as a waiver of any rights, including, without limitation, the right to contest jurisdiction or service of process or to demand trial by jury of any issue.

Dated: January 20, 2021

K&L Gates LLP

/s/ Travis Powers
Travis Powers, Esq.
(NY Bar #4951315)
K&L Gates LLP
One Newark Center, 10th Floor
Newark, New Jersey 07102
Telephone: (973) 848-4000
Facsimile: (973) 848-4001
Email: travis.powers@klgates.com

Attorneys for Medici 1150 N. American Street LLC

CERTIFICATE OF SERVICE

I certify that on January 20, 2021, I caused the attached Notice of Appearance and Demand for Service of Papers to be electronically filed with the Clerk, United States Bankruptcy Court, Southern District of New York, by ECF and one copy of the aforementioned document by way of first class mail or ECF to those persons listed on the attached service list.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: January 20, 2021

By: /s/ Travis Powers
Travis Powers, Esq.
Travis.powers@klgates.com

SERVICE LIST

Trustee

Alan Nisselson

Windels Marx Lane & Mittendorf, LLP

156 West 56th Street

New York, NY 10019

Via ECF

U.S. Trustee

United States Trustee

Office of the United States Trustee

U.S. Federal Office Building

201 Varick Street, Room 1006

New York, NY 10014

Via ECF